

Shawn J. Lau, Esquire
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**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: RG AVIATION LLC Debtor	CHAPTER 11 Bankruptcy No. 24-14201
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DECLARATION OF PROPOSED ATTORNEY PURSUANT TO 11 U.S.C.
§§327 AND 329, BANKRUPTCY RULES 2014 AND 2016

I, Shawn J. Lau, Esquire for myself and for the firm Lau & Associates, P.C.
declares as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, could and would testify competently to such facts.
2. I submit this Declaration in accordance with Bankruptcy Rule 2014 and in support of the Application filed by Debtor to employ Shawn J. Lau, Esquire and Lau & Associates, P.C. as counsel for the Debtor.
3. I am the sole shareholder of Lau & Associates, P.C., 4228 St. Lawrence Avenue, Reading, Pennsylvania 19606 and I am authorized to make this Declaration on its behalf.

4. I have been licensed to practice law in the State of Pennsylvania since 1989 and State of New Jersey since 1990. I have been admitted to practice law in the United States District Court for the Eastern District of Pennsylvania, U.S. District Court, District of New Jersey, Middle District of Pennsylvania and in the United States Circuit Court of Appeals for the Third Circuit.
5. Except as described in Paragraph 5 below, neither I nor any other person employed by Lau & Associates, P.C. has any connection with RG AVIATION LLC, its creditors, the U.S. Trustee or any other party in interest in this Chapter 11 case. I formed this belief after a thorough investigation, including: (a) reviewing the most recent list of Lau & Associates, P.C.'s clients and the firm's mailing list; and (b) posting a message for all attorneys and paralegals on Lau & Associates, P.C. electronic mail system advising the Debtor's decision to employ Lau & Associates, P.C. and requesting information regarding potential conflicts of interest.
6. To the best of my knowledge, Lau & Associates, P.C. neither represents nor holds interests adverse to the Debtor with respect to the matters for which it is to be employed.
7. It is contemplated that the source of compensation and reimbursement of expenses shall be unencumbered funds of Debtor's bankruptcy estate and a retainer of \$ 7,000.00 plus the filing fee. Mr. Lau bills at the rate \$225 an hour and Associates and paralegals bill at standard hourly rate.
8. To the best of our knowledge, the statements made in the application regarding matters of prior representation by Lau & Associates, P.C. are true, correct and complete.

9. Lau & Associates, P.C. will provide monthly, informational billing statement to Applicant; however, Lau & Associates, P.C. acknowledges that Court approval is required for further payments from Applicant and that its retention of the balance of the Retainer as of the Petition Date and use of same, is subjected to subsequent review and approval by the Court.
10. Lau & Associates, P.C. has not shared or agreed to share its compensation for representing Applicant with any other person or entity.
11. To the best of our knowledge, Lau & Associates, P.C. does not hold or represent any interest adverse to Applicants or their estates and Lau & Associates P.C. is a “disinterested” person as that term is defined in the United States Bankruptcy Code. Lau & Associates, P.C. has made the disclosures to Applicants that are set out in the Application and Retention Agreement.

I declare and verify under penalty of perjury that the foregoing is true and correct.

Dated: November 22, 2024

/s/ Shawn J. Lau
Shawn J. Lau, Esquire
Lau & Associates, P.C.
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Attorney for Debtor